



Spring CAPCA

April 24, 2003

Pat Walker, Assistant Bureau
Chief

Bureau of Air Quality

8Hr Ozone Modeling

Compliance Assistance

Titrev

Outreach



MACT

TABFTE

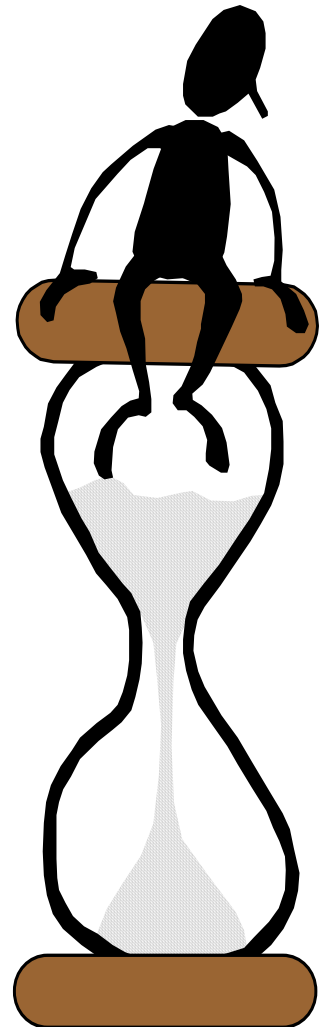
EAP

\$ \$ \$

Capacity Building

South Carolina's 8-Hour Ozone Boundary Recommendations

- Working on draft proposal
- Following EPA boundary guidance
 - **Considering 11 factors/criteria**
- Will seek public comment
 - ~ **May 15, 2003**
 - **Info will be on website**
- Submit to EPA on or before July 15
- Stay tuned – more to come this afternoon



8-Hour Ozone Modeling Effort

- 1998 Base Case completed
- 2010 modeling initial results indicate more reductions needed for upstate & midlands
- Updating inventory to initiate 2007, 2012 & 2017 Future Year Cases for EAP
- Plan to complete bulk of modeling by January 31, 2004
- All modeling work completed by March 31, 2004

Ozone Early Action Plan

- Started our participation last August
- Committed to providing “Cleaner Air Sooner”
- Working with EPA, other States, other State agencies, local government, and other stakeholders
- A lot of work, NOT a lot of time



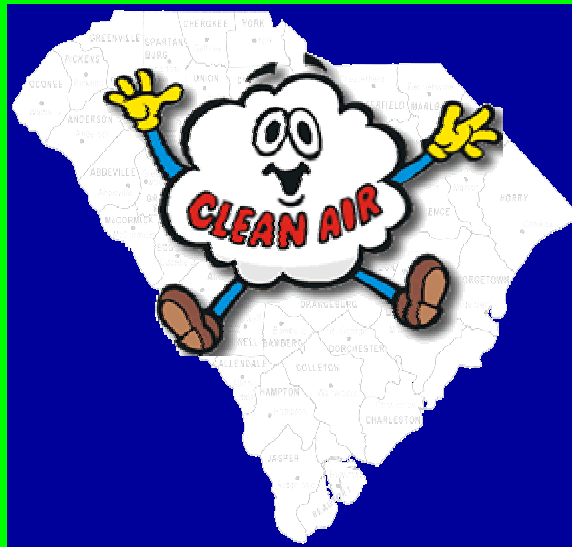
Take A Break From the Exhaust Program

Goals:

- To reduce emissions from mobile sources
- To increase awareness of the impact of mobile sources on air quality
- To encourage employees to take voluntary actions to help improve air quality

OZONE ACTION CLASS

South Carolina



South Carolina

The Ozone Pollution Solution

NSR Reform Items

- Plant-wide applicability limits
- Clean unit exclusion
- Pollution control & prevention exclusion
- Actual to future actual
- 10 year actual emissions look-back

Experience With Four Items

- BMW has been issued a PAL permit under our existing regulations
- A WEBCO decision (actual to future actual) has been completed for a utility project
- We have considered two year period earlier than past five prior years for “actuals” test
- PCP projects have been done for MACT implementation

NSR Reform

- Staff work on “early action plan” has taken precedence over review and implementation of NSR Improvement changes in to South Carolina’s regulations.
- Three year deadline for implementing regulation changes.

MACT Update

- 13 new MACT standards finalized (signed)
February 28, 2003
 - ~73 SC facilities subject
- **No 112(j) Part 2 applications due May 15, 2003**
- If applications are ever needed, they are available on the SCDHEC Website
- Latest deadlines for remaining MACT Standards
 - August 29, 2003 (12 standards)
 - February 27, 2004 (4 standards)
 - June 15, 2005 (2 standards)
- “MACT Update” handout at SC DHEC booth

2003 MACT Compliance Dates

- Polymers & Resins Group III
 - January 20, 2003
- Secondary Aluminum Production
 - March 24, 2003
- Hazardous Waste Combustion
 - September 30, 2003
- Pesticide Active Ingredient Production
 - December 23, 2003

SC Permit Status for Minor, PSD, & CM Sources

January 1, 2002 to March 31, 2003

| Application Type | Number Received | Number of Decisions Made | No. Decisions Made W/in Timeframe | % Decisions Made W/in Timeframe |
|--------------------------|-----------------|--------------------------|-----------------------------------|---------------------------------|
| CONSTRUCTION | 2507 | 2353 | 2129 | 85% |
| OPERATING | 604 | 642 | 478 | 79% |
| PSD | 14 | 14 | 13 | 93% |
| CONDITIONAL MAJOR | 236 | 136 | N/A* | N/A* |
| General Permits | 46 | 96 | N/A* | N/A* |

* Note: N/A- timeframes not included in Environmental Protection Fees

100% of Title V Permits Issued!!!



SC Title V Permit Status as of April 15, 2003

| PERMIT REVIEW PROCESS | INITIAL TITLE V | NEW TITLE V | RENEWAL TITLE V | Modifications AA, 502(b)(10) Minor & Major | TOTAL |
|--------------------------------------|----------------------------|------------------------|----------------------------|---|--------------|
| APPLICATIONS RECEIVED | 299 | 86 | 47 | 812 | 1244 |
| ISSUED PERMITS | 299 | 71 | 7 | 505 | 882 |

Teamwork!



Permit Streamlining

- “To create a more efficient, thorough, and user-friendly permitting process, combining the needs of industry, regulators, and the public through education, communication, and innovation”

Welcome to Permitting, may I take your order?



Flexibility & Exemptions

- Drivers
 - Industry Response to Customers
 - Workload Demands on Permitters
 - Mounting C/Ps for Modifications
 - Meaningful Permitting

Operational Flexibility

Built-in-Flexibility

- Modifications in O/P vs. C/P
- Replacements in Kind
- New Products, New Materials
- Exemptions
- Volunteer Control Device

Exemptions

- Update Like for Like Guidance
- SC DHEC 61-62.1 Section II, A, I a
- Modeling

Expanding Exemptions

- Insignificant Activities List
- Non NSPS Boilers
- Non Boiler Combustion Sources

Protections

- NAAQS and Air Toxics
- Operating Permit Status
- Regulation Triggers: PSD
- No New Compliance Issues
- Attainment

Industry Part Give & Take

- Living with Emission Limits
- Detailed Permits Applications & Notifications
- OSIL
- Tiered Notification and Approval
- Monitoring, Recordkeeping & Reporting

Next Steps

- Industry Groups- Speak Up, Practically
- Response to White Paper
- Shooting for the Moon
- Protocol
- Regulatory Changes

Compliance Assistance

- BAQ is foregoing formal enforcement action for certain violations. Examples:
 - Sources that have failed to obtain a permit for a minor or exempt source.
 - Deviations from parametric monitoring if corrective action is implemented in a timely manner (source must return to the specified range or re-establish ranges using similar methodology used originally).

Compliance Assistance – cont'd

- BAQ has clarified that permitting is required for internally vented sources. Facilities in this category will be provided an opportunity to meet the requirement.
- BAQ is working with facilities to correct initial record keeping and reporting violations instead of referring to enforcement.

Compliance Assistance – cont'd

- High Priority Violations such as violations of emissions standards, PSD permitting or control requirements, State LAER, and failure to submit or inaccurate submittal of TV Annual Compliance Certifications are being addressed through routine enforcement procedures.

Timely Enforcement

- The enforcement program has established priorities and time frames to address actions in a systematic manner in an effort to reduce the existing backlog.
- There are established EPA guidelines for timely and appropriate actions for High Priority Violations.
- Using EPA's guidance and our own criteria, BAQ will address PSD, LAER, emission exceedances, TV reporting, and TV Annual Compliance Certification violations first.

Timely Enforcement – cont'd

- Review of assessed penalties indicates they have not provided adequate deterrence.
- Expect fewer orders but higher penalties.
- Priorities and the use of compliance assistance will be adjusted as needed.

Enforcement Activity

- Actions in 2002
 - 343 Notices of Violation
 - 109 Orders
 - \$1,260,300 in penalties
- Prevalent violations
 - Record Keeping/Reporting
 - Failure to Obtain a Permit
 - Emissions
 - Open Burning

The Budget

- Approx 8% reduction in state money with potential for more in July
- Federal grant has no significant increases
- Fee expenditures are at or above collections
- Plan to stay at \$25/ ton plus CPI (\$36.03 currently)
- Streamlining emissions inventory efforts to spend less time calculating for fees and more time on data for modeling efforts

Capacity Building

- Approximately 10% of EQC staff to end employment in next three years
- Slightly less than 10% of air program staff
- Formal program to build on and expand current knowledge skills and abilities
- Pilot has begun which will be basis for long range program
- Using in-house or available Agency resources/staff



South Carolina Air Quality Information

Bureau of Air Quality

(803) 898-4123

<http://www.scdhec.net/baq>

ALSO note Email address changes:

Walkerpt@dhec.sc.gov

